

0000 2268

AMERICAN CYANAMID CO  
FORT WORTH TX  
478A.TXD008017261 0001  
AMERICAN CYANAMID CO  
FORT WORTH, TX 76106

TXD008017  
RC NT VOL



000000010117 HZ/RC/NT



0 152 0000 2270

JUL 14 1989

Honorable Lloyd M. Bentsen  
United States Senator  
961 Federal Building  
Austin, Texas 78701

Dear Senator Bentsen:

Thank you for your letter of June 14, 1989, requesting information regarding citizens' concerns pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of the Environmental Protection Agency (EPA) in early 1980 by the U.S. Department of Labor. The EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but were being stored in container and tank storage units. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983, at which time, the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

Allegations concerning past operating practices at this site were recently raised again in various news media reports. EPA investigated similar allegations in 1980, 1981, and 1982. Based on data gathered during these investigations, it does not appear that hazardous waste was buried at the site, nor does the site appear to immediately threaten human health or the environment. EPA has determined that a new investigation is not warranted; however, these allegations are being investigated by the City Manager's Office in Fort Worth. EPA has offered to provide any necessary technical assistance for purposes of their investigation.

Please be assured that the Agency has a continuing interest in this matter. If you have any questions, or need further assistance, do not hesitate to call me.

Sincerely yours,

Original Signed By:

Robert E. Layton Jr., P.E.  
Regional Administrator

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6AX)  
6H-CT:JTRUITT:cds:07-10-89:5-6794 File Code No. TXD008017261 Enf. 1  
HAZ-114-89

6H-CT	6H-C	6H-S	6H	6H	6X
COLEMAN	BROWN	WILLIAMSON	GERSH	DAVIS	CHARLES

0152 0000 2472

CONTROL SLIP FOR OFFICE OF CONGRESSIONAL CORRESPONDENCE  
RM. 227-G, MSNW  
382-7640

CONTROL NO: AL892967

FROM: HONORABLE LLOYD M. BENTSEN D/TX  
UNITED STATES SENATOR  
(STATE OFFICE)

DUE DATE: 7/7/89

INCOMING: 6/14/89

RECEIVED: 6/21/89

ASSIGNED: 6/21/89

CLOSED: \_\_\_\_\_

CONSTITUENT: MR. & MRS. R. SANDERS  
N. RICHLAND HILLS, TX

SUBJECT: INVESTIGATE CYNNAMID CHEMICAL CO.

ASSIGNED: 1 REGION 06

3 \_\_\_\_\_

2 \_\_\_\_\_

4 \_\_\_\_\_

SIGNATURE: REGIONAL ADMINISTRATOR

SPECIAL INSTRUCTIONS:

SEND "HARD" COPY OF REPLY ALONG WITH ORIGINAL CONTROL  
SLIP TO ROSEMARY CARROLL A101 HDGTR.

NOTE:

COURTESY COPIES:

SOLID WASTE & EMERG RESP  
WATER  
OCL/GUINN





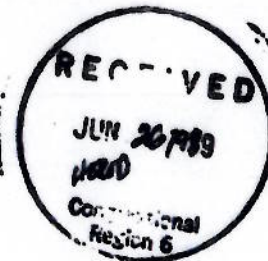
LLOYD BENTSEN  
TEXAS

4 892967

United States Senate  
WASHINGTON, D.C. 20510

COMMITTEE  
ON  
COMMERCE, SCIENCE AND TRANSPORTATION  
JOINT ECONOMIC  
JOINT COMMITTEE ON TAXATION

June 14, 1989



P6  
St  
CD  
S. 11  
RA

Mr. Craig DeRemer, Director  
Office of Congressional Liaison  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Mr. DeRemer:

I recently received the enclosed constituent inquiry, and I would very much appreciate your providing me with any pertinent information you might have regarding the matter, or any assistance you might be able to give in routing it to the proper authorities.

Your kind consideration is greatly appreciated.

Sincerely,

B

*Lloyd Bentsen*  
Lloyd Bentsen

Enclosure

PLEASE REPLY TO:

961 Federal Building  
Austin, Texas 78701  
ATTN: Anne Mosher

RECEIVED  
6/21/89



0 152 0000 2234

SEN. BENTON 197 61  
AS OUR SENATOR 5/14/84  
REQUESTING YOU TO PERSUADE  
THE EPA TO REINVESTIGATE  
THE ABANDONED AMERICAN  
CYANAMID CHEMICAL <sup>subject</sup>  
IN FORT WORTH, TX FOR CHEMICAL  
AND/OR HAZARDOUS WASTES ASAP.  
PLEASE REPLY AS WE ARE CONCERNED.  
THANK YOU MRS. APPEL  
CASTLE

0 152 0000 2275

<b>FROM</b> <b>HARMAN, Douglas</b> <b>City Manager, Fort Worth, TX</b>			<b>CONTROL NO.</b>  	
<b>SUBJECT AND DATE</b>  <b>5-11-89</b>  <b>Re the investigation of the American Cyanamid plant, Fort Worth, TX</b>			<b>DATE RECD</b> <b>6AX-173</b>  <b>5-22-89</b>  <b>DUE DATE</b>  <b>6-5-89</b>	
<b>REFERRED (1)</b> <b>Director 6H</b>	<b>(2)</b> <b>cc: 6E, 6C, 6A</b> <b>6D</b>	<b>(3)</b>  	<b>(4)</b>  	
<b>DATE</b> <b>5-22-89</b>	<b>REPLY SENT TO</b>  	 <b>5-24-89</b>	<b>DATE RELEASED</b>  <b>5/24/89</b>	
<b>REMARKS</b>  <b>RA reply</b> <b>cc: Gilleland, (6AX)</b>			<b>ACKNOWLEDGED - 6A:</b>  <input checked="" type="checkbox"/> <b>5/24/89</b>  <b>NO ANSWER NEEDED</b>  <input type="checkbox"/> <b>(Explain in remarks)</b>	

EPA Form 5180-1 (8-72)  
 REPLACES PCOCA FORM 72 AND  
 NEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE



0 152 0000 2276  
MAY 31 1989

Mr. Douglas Harmon  
City Manager  
Office of the City Manager  
1000 Throckmorton Street  
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but ~~that~~ hazardous wastes were being stored in units consisting of container ~~and~~ tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of this investigation.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

/s/ Joe D. Winkle

Robert E. Layton Jr., P.E.  
Regional Administrator **(SA)**

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6H)  
6H-CT:JTRUITT:tpc:05-18-89:5

6H-CT COLEMAN  
6H-C BROWN  
6H-S WILLIAMSON

no. 6H-292/6AX-173

*File Code  
# please*

*5/3/89*

0 152 0000 2277

MAY 31 1989

Mr. Douglas Harmon  
City Manager  
Office of the City Manager  
1000 Throckmorton Street  
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but that ~~hazardous wastes~~ were being stored in units consisting of container ~~and~~ tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of this investigation.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

/s/ Joe D. Winkle

Robert E. Layton Jr., P.E.  
Regional Administrator **SEA**

bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H), Gilleland (6AX)  
6H-CT:JTRUITT:tpc:05-18-89:5-6775

file code no.  
control no. 6H-292/6AX-173

6H-CT COLEMAN  
6H-C BROWN  
6H-S WILLIAMSON

6H GORDON  
6H DAVIS  
6X CHARLES 5/14/89



10 152 0000 2278

Mr. Douglas Harmon  
City Manager  
Office of the City Manager  
1000 Throckmorton Street  
Fort Worth, Texas 76102

Dear Mr. Harmon:

This is in response to your letter of May 11, 1989, requesting clarification of the Environmental Protection Agency's (EPA) position regarding concerns and allegations raised pertaining to the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas.

The American Cyanamid facility was first brought to the attention of EPA in early 1980 by the U.S. Department of Labor. EPA initiated an investigation of the site in 1980 and continued this investigation through 1982. The findings were that hazardous wastes had not been buried onsite, but that hazardous wastes were being stored in units consisting of container and tank storage areas. These units had been granted interim status to operate under the Resource Conservation and Recovery Act (RCRA). Operation of these storage units continued until 1983 at which time the units were closed and the hazardous wastes removed as required in a closure plan approved by the Texas Water Commission (TWC).

As you are aware, allegations concerning past operating practices have been repeated. Due to these continuing concerns, EPA considered reinvestigating the site, utilizing its technical assistance team. However, no action was initiated after EPA was informed that the allegations were being investigated by your office. EPA has offered to provide your office with any necessary technical assistance for the purposes of their investigation, since the Agency feels there is no need to conduct two distinct investigations.

Please be assured of the Agency's continuing interest in this matter.

Sincerely,

Allyn M. Davis  
Director  
Hazardous Waste Management Division (6H)  
bcc: R. Brown (6H-CS), D. Smith (6H-C), G. Jackson (6H)

6H-CT:JTR/ITT:tpc:05-18-89:5-6775

file code no.

6H-C  
COLEMAN

6H-S  
WILLIAMSON

6X  
CHARLES

6H  
GERSH

5/25

5/24/89

0152 0000 2279

**CITY OF FORT WORTH, TEXAS**



OFFICE OF THE CITY MANAGER  
1000 THROCKMORTON STREET  
FORT WORTH, TEXAS 76102  
870-6111 / AREA CODE 817

May 11, 1989

Mr. Robert E. Layton, Jr.  
Regional Administrator  
U.S. Environmental Protection Agency  
Region VI  
1445 Ross Avenue (6T-AM)  
Dallas, Texas 75202

Dear Mr. Layton:

The City of Fort Worth has been in contact with your agency regarding the American Cyanamid plant located at 600 North Jones, Fort Worth, Texas. Recently a Channel 8 news reporter stated that the Environmental Protection Agency was prepared to have a Technical Assistance Team investigate the American Cyanamid plant site.

In an effort to resolve the issues, representatives and your agency on an almost daily basis over the last several weeks. If your agency feels the need to have a technical assistance team evaluate this site, please carry out this process. The City of Fort Worth wishes to encourage EPA to carry out whatever analysis you deem appropriate. In addition, I respectfully request your agency to provide a written explanation as to the position EPA has had in the past and currently has regarding the facility.

I want to assure you that our intention is to resolve the concerns on the American Cyanamid site and work both with your agency and the company in resolving this as soon as possible.

Your assistance in addressing this issue as well as any additional concerns you may have is openly accepted.

Sincerely,

Douglas Harman  
City Manager

cc: M. Larry McMillen, Chief, Fort Worth Fire Department  
Nick U. Curry, Director, Public Health Department  
Gary Santerre, Director, Transportation and Public Works  
Richard Sawey, Director, Water Department  
David Ivory, Senior Assistant City Manager  
Ruth Ann McKinney, Assistant City Manager  
Bob Ferrell, Assistant City Manager  
Ramon Guajardo, Assistant City Manager  
Alan Davis, U. S. Environmental Protection Agency, Region VI



0452 0000 2200



PRESENTED  
MAY 12 1988  
PORT WORTH TEXAS

*[Handwritten signature]*

Robert Kayton, Jr.  
Regional Administrator  
Environmental Protection Agency  
Region VI  
1445 Ross Avenue  
Dallas, Texas 75202

*[Handwritten signature]*



CITY OF PORT WORTH, TEXAS  
OFFICE OF THE CITY MANAGER  
1001 THUNDERBOLT BLVD. PORT WORTH, TEXAS 76130  
200634

0452 0000 2281

Region 6

American Cyanamid Company, Fort Worth, Texas

**ISSUE:** What, if any, significant environmental problems exist at the American inactive American Cyanamid Company facility in Fort Worth, and what involvement should EPA have in investigating the situation?

**TIMING:** Immediate and ongoing.

**CONCERNED GROUPS:** EPA, Region 6, Texas Water Commission, Texas Highway Department, City of Fort Worth, U.S. Army, public interest groups.

**BACKGROUND:** Available information indicates that American Cyanamid Company's Fort Worth plant was constructed under the direction of the Chemical Construction Division of the company in 1942-43. The plant was operated initially by American Cyanamid for the Defense Corporation and produced fluid cracking catalyst for removal of excess nitrogen and sulphur from crude oil. The catalyst was used to produce aviation grade gasoline for the U.S. Armed Services during World War II.

Upon completion of the contract, American Cyanamid purchased the facilities and continued to produce fluid cracking catalyst. The major raw material for the process was bauxite ore and various other substances, including nickel, cobalt, vanadium, and molybdenum, were used to impregnate the catalyst for different results.

Three waste ponds (approximately 50'x70') were located at the facility and used in the treatment process at one time. Prior to 1964, the company discharged all wastewater to the Trinity River. At the time of an EPA inspection of the facility in 1980, the waste stream (containing nitric and sulfuric acid) was neutralized with caustic in an underground tank before going to one of the ponds for settling. Overflow was discharged to the City of Fort Worth Wastewater Collection System. Storm water, mixed with a portion of process water was discharged periodically (about 6-8 times a year) to the Trinity River. After storage in an underground tank, a copper and water waste stream was removed and disposed of by deep well injection off-site.

Hydrocyanic acid (HCN), also referred to as hydrogen cyanide, was apparently produced by American Cyanamid in California until 1955. The cylinders of HCN were distributed to other plants to sell to farmers for fumigation of grain silos. The company has indicated that no cylinders were stored at the Fort Worth plant since 1965.

American Cyanamid submitted to EPA a Notification of Hazardous Waste Activity on August 18, 1980. Additionally, the company submitted a Part A permit application on November 10, 1981, and was granted Interim Status to store hazardous wastes in tanks and containers. Those wastes



identified in the Part A include: spent solvents (F001-F003 and F005/container storage); chromium waste (D007/tank storage); and low pH wastes (D002/tank treatment). The treatment of the D002 waste was found to be excluded from RCRA, as treatment occurred in a primary neutralization tank, and was removed from the Part A on August 4, 1981. American Cyanamid ceased operation and clean closed all Interim Status hazardous waste management units in mid-1983. The permit application was formally withdrawn on April 30, 1984.

EPA conducted a Preliminary Assessment on the site in November 1979, and a Site Inspection in July 1980. The Site Inspection was conducted as a result of a referral from the Occupational Safety and Health Administration. We concluded in October 1982 that no further action was needed under Superfund because the facility was active and regulated under RCRA.

In June 1981, American Cyanamid submitted a notification for a hazardous waste site to EPA in accordance with section 103(c) of CERCLA. The company stated that 25 to 50 partially filled drums of vanadium containing catalyst had been buried on the site in 1972. However, in August of 1981, the company withdrew the earlier notification noting that the material was not listed or characteristic hazardous waste.

Over the years, numerous allegations have surfaced about handling and disposal of hazardous materials at the American Cyanamid facility. Secret operations by the Army, including production of nerve gas, have been rumored, but not substantiated. Numerous former employees reportedly have suffered serious illnesses. Some of the former employees have taken legal action against the company, but none have been settled.

One of the former employees who has pending legal action against American Cyanamid was interviewed by EPA in January 1981. As a result of that interview, EPA sent a RCRA 3007 letter to the company requesting information regarding disposal of hazardous wastes at the Fort Worth facility. The company's response questioned EPA's authority to seek information from the company under section 3007, but answered our questions anyway. The response added very little new information (only about the 25-50 drums mentioned above) and specifically stated that there was no evidence of any HCN cylinders being disposed of on-site.

**CURRENT STATUS:** The Texas State Highway Department is evaluating alternative alignments for State Highway 121 north of Downtown Fort Worth. One or more of the alternatives could pass through portions of the American Cyanamid property. One or more of the alternatives could also pass through portions of a historic neighborhood. The introduction of the historic preservation issue apparently has caused the questions about what is buried on the American Cyanamid property to resurface.

The City of Fort Worth had been in contact with American Cyanamid about addressing the issue even the current media storm commenced. The City



has now sped up the process and plans to meet with the company on May 4 or 5. The City apparently prefers to work with American Cyanamid to assess the situation, determine if any problems exist, and have the company conduct any cleanup that might be necessary.

Relative to RCRA, all hazardous waste management units are closed and the facility is inactive. Releases, should they have occurred, would appear to have originated from pre-RCRA land disposal units.

The Texas Water Commission has taken the position that there is no new information about the site. They acknowledge that some substances are still buried at the site but that they are not causing a problem.

The American Cyanamid site has not been ranked using the Hazard Ranking System model. However, based on available information, it does not appear that the site would be a potential NPL candidate (using either the current or proposed revised HRS) because of a lack of targets in the available pathways.

#### OPTIONS:

##### General

Monitor the investigation of the City of Fort Worth and provide technical review assistance if requested.

##### Superfund

1. Pre-remedial site inspection and HRS prescore analysis to follow up on previous investigation. This approach would allow us to gather more information, but the site does not appear to be a potential NPL candidate.
2. Preliminary assessment for emergency response action. This would allow us to gather information about what was buried at the site, but there appears to be no substantiated, or new, allegations about activities at the facility.
3. Enforcement action to force American Cyanamid to conduct a remedial investigation. Sufficient cause may be lacking.

##### RCRA

1. Section 3013 Order to require monitoring, testing, and reporting with respect to a site where a release of a hazardous waste has occurred. We do not know at this time whether a release of hazardous waste has occurred.
2. Section 3008(h) Order to require corrective action/investigation to be conducted at an Interim Status facility where a release of hazardous waste or hazardous constituents has occurred. As with 3013, we do not have conclusive evidence at this time.

KEY CONTACT: Allyn M. Davis, Director  
Hazardous Waste Management Division  
(214) 655-6700  
(FTS) 255-6700  
(214) 739-5025 (home)

Prepared by:  
William Taylor  
5-6740



### Superfund File Chronology

- January 30, 1979 - Letter from Wallace Cooper, EPA to David Butterfield, American Cyanamid, regarding disposal of hydrocyanic acid (HCN) cylinder and thanking American Cyanamid for efforts to locate and properly dispose of same.
- February 12, 1980 - Preliminary Assessment of American Cyanamid facility by EPA, apparent seriousness of problem identified as "none".
- March 10, 1980 - Final Strategy determination by EPA on facility, no apparent problem, no action needed.
- June 27, 1980 - Record of Communication regarding a telephone call from Mr. Kurtz, OSHA Dallas Regional Office, to Bob Forrest, EPA, advising EPA of allegations by former American Cyanamid employee of burial on company property of 2-3 HCN cylinders, vanadium pentoxide, copper compounds and other chemicals.
- July 17, 1980 - Memo from Gerald Fontenot, EPA, to Charlie Gazda, EPA, requesting an inspection of the facility based on the former employee's allegations.
- July 30, 1980 - Notice of Inspection of facility under Section 3007 of RCRA and Section 308 of FWHPCA, Inspector Robert Hiller, EPA, Recipient Albert Hoff, American Cyanamid (samples collected).
- July 30, 1980 - Site Inspection Report by EPA (with Ecology and Environment, Inc.), apparent seriousness of problem identified as "low".
- August 11, 1980 - Memo Robert Hiller, EPA, to Charles Gazda, EPA, summarizing Site Inspection Report, references HCN cylinders distributed to plants to sell to farmers but no cylinders at Fort Worth plant since 1955.
- August 12, 1980 - Letter Richard B. Tabakin, Coordinator Environmental Science, American Cyanamid to Dr. William Langley, Chief Houston Lab, EPA, requesting that only soluble fraction of samples be determined and that EPA advise the company of the method being used.
- August 26, 1980 - Memo from U.S. Department of Labor, Fort Worth Area Office, to Ray Lozano, EPA, transmitting results of analyses of soil samples taken as a part of an OSHA investigation. Vanadium, copper, molybdenum, nickel, and lead detected in samples from surface around former disposal areas, and in drainage ditch leading from property.
- September 1, 1980 - Letter Charles Gazda, EPA to Richard A. Tabakin, American Cyanamid advising him that total metals would be determined.



- September 30, 1980 - Memo William D. Langley, EPA Houston Lab, to William J. Librizzi, EPA, Director S & A Division, transmitting results of analyses for selected metals of samples taken from facility on July 30, 1980, as part of a Site Inspection. Elevated levels of cobalt, copper, lead, molybdenum, mercury, nickel, and zinc were found in Trinity River sediment at the facility discharge pipe.
- October 31, 1980 - Notes to file from Dr. Bill McAnalley, EPA, on water criteria for cobalt, copper, lead, molybdenum, nickel and mercury.
- November 6, 1980 - Letter Gerald Fontenot, Chief, Hazardous Materials Enforcement Section, to Albert W. Hoff, Plant Manager, American Cyanamid transmitting sample analyses results.
- November 20, 1980 - Notes from meeting with American Cyanamid, participants not stated.
- January 20, 1981 - Memo from Jim Turner, EPA, to Bill Hathaway, EPA regarding  
 1) information from Arthur Berkley, former employee at the facility, about waste disposal at the site ("no startling new allegations") and  
 2) development of a RCRA 3007 letter to American Cyanamid. Attachments,  
 1) Notes from Arthur Berkley, 2) list of substances, 3) drawing of site by Berkley and Russ Bartley, and 4) cassette tape.
- January 26, 1981 - RCRA 3007 letter from Diana Dutton, Director, Enforcement Division, EPA, to American Cyanamid Company requesting information on disposal of hazardous wastes at the Fort Worth facility.
- February 20, 1981 - Letter from H.J. Mitchell, Acting Plant Manager, American Cyanamid Company, to Diana Dutton, EPA, responding to 1-26-81 RCRA 3007 request. Response questions EPA's authority under 3007 to seek information from the company, but answers questions anyway. Answers:  
 1) Hazardous wastes managed onsite were corrosive process wastes, small quantities of ignitable solvents used in maintenance, chromium containing liquid waste (none of which are buried on-site) and off-grade phthalic anhydride catalyst sold under the tradename PAA, composed of silica substrate impregnated with vanadium pentoxide (some of which may have been buried on-site), 2) Other waste materials buried were neither listed nor characteristic RCRA hazardous wastes; 3) no hazardous wastes known to be buried relative to certain sources specified in EPA's letter, 4) no evidence of HCN cylinders being buried on-site.
- June 1, 1981 - Letter from H. Mitchell, Acting Plant Manager, American Cyanamid Company to EPA, Region 6 transmitting the June 5, 1981 hazardous waste site notification.
- June 5, 1981 - CERCLA 103(c) notification of hazardous waste site signed by H. Mitchell, Acting Plant Manager identifying waste as 25 to 50 partially filled drums of vanadium-containing catalyst (listed waste P 120).



August 4, 1981 - Letter Hershel J. Mitchell, Acting Plant Manager, American Cyanamid Company, to EPA, Region 6, withdrawing the June 5, 1981, notification of hazardous waste site based on 1) the waste not being pure or off-specification vanadium pentoxide and not a listed hazardous waste and, 2) the waste is not RCRA characteristic hazardous waste.

July 7, 1982 - Fort Worth Star Telegram Article titled "Dust to dust: 5 men suing company."

October 5, 1982 - Final Strategy determination by EPA, site is active RCRA facility. Refer file to RCRA, no action needed.

January 14, 1986 - Letter Dick Whittington, P.E., Regional Administrator, EPA, Region 6, to U.S. Senator Phil Gramm providing brief history and stating that EPA and TMC believe based on available information "that there has been no hazardous waste activity at this site."

#### RCRA File Chronology

- August 18, 1980 - Notifications.
- November 10, 1980 - Part A application.
- July 24, 1981 - Letter from EPA stating Part A had been received and outlining Interim Status requirements.
- August 4, 1981 - Amendment of Part A from American Cyanamid to exclude primary neutralization tank.
- June 30, 1982 - Letter on financial test for financial assurance from American Cyanamid.
- July 12, 1982 - Letter on corporate demonstration for insurance from American Cyanamid.
- August 19, 1982 - Letter from EPA to American Cyanamid concerning submittal of financial information to states.
- May 17, 1983 - Letter submitting closure plan to EPA for facility. Closure plan identifies drum and tank storage.
- 1984 (Exact date unknown) - Affidavit of Exclusion from Hazardous Waste Permitting Requirement. Permit not required due to closure of facility.
- April 30, 1984 - Letter from the Texas Water Commission to American Cyanamid confirming withdrawal of permit.



It's  
good for  
you !!

17/18/82 1st 7/15/82, LC

LETTER WITH

EPA ID

TXDC02C17261

Name

Amckon (p) m.w.d

Date

7/15/82

An EPA review of the attached financial information indicates the following:  
[ ] Material appears to be in order.  
[ ] The following deficiencies have been noted:

Closure-postclosure

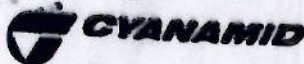
- [ ] No closure-postclosure information submitted
- [ ] Surety bond does not meet required wording of Paragraph 264.151(a)
- [ ] Letter of credit does not meet required wording of Paragraph 264.151(b)
- [ ] Insurance policy does not meet required wording of Paragraph 264.151(d)
- [ ] Falls financial test for closure
- [ ] Original signatures do not appear on documentation
- [ ] Letter from chief financial officer does not meet required wording of Paragraph 264.151(f)
- [ ] Corporate guarantee does not meet required wording of Paragraph 264.151(g)
- [ ] Inadequate/missing CPA audit of financial statement and/or accountant's opinions
- [ ] Fails to address all U.S. facilities
- [ ] Fails to include closure/postclosure cost estimates
- [ ] Insufficient/missing CPA special report
- [ ] Other

Liability

- [ ] No liability information submitted
- [ ] Insurer not qualified
- [ ] Insurance certificate does not meet required wording of Paragraph 264.151(j)
- [ ] Insurance endorsement does not meet required wording of Paragraph 264.151(i)
- [ ] Policy limits are beneath RCRA minimums
- [ ] Original signatures do not appear on documentation
- [ ] Falls financial test for liability
- [ ] Letter from chief financial officer does not meet required wording of Paragraph 264.151(g)
- [ ] Inadequate/missing CPA audit of financial statement and/or accountant's opinions
- [ ] Fails to address all U.S. facilities
- [ ] Original signatures do not appear on documentation
- [ ] Other

Also references to LAD002051089, LAD008175390





American Cyanamid Company  
Wayne, NJ 07470

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



TX  
LA

July 12, 1982

Regional Administrator  
Environmental Protection Agency  
First International Building  
1201 Elm Street  
Dallas, Texas 75270

Attention: RCRA Financial Requirements

Gentlemen:

American Cyanamid Company (or one of its subsidiaries) operates plants in your region which are subject to regulation as treatment, storage or disposal facilities under the Resource Conservation & Recovery Act (RCRA). These plants are listed in the attached Certificate of Insurance.


Cyanamid chooses to demonstrate compliance with the requirements of 40CFR264.147 and 40CFR265.147, which call for proof of liability insurance covering sudden and accidental releases at these RCRA facilities, by providing the attached Certificate of Insurance for these facilities to your office.

We believe that this submittal fulfills all of Cyanamid's present responsibilities and obligations under this aspect of these regulations.

If you have any questions regarding this submittal, please contact the undersigned at (201) 831-3261.

Very truly yours,

AMERICAN CYANAMID COMPANY

  
E. A. Caldwell, Jr.  
Director, Corporate Insurance

TAC:kr  
Attachment

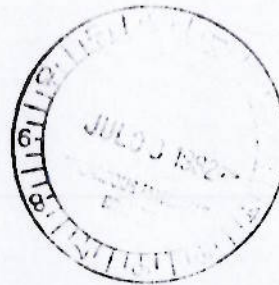


TX  
LA

American Cyanamid Company  
One Cyanamid Plaza  
Wayne, NJ 07470

June 30, 1982

Regional Administrator  
Environmental Protection Agency  
First International Building  
1201 Elm Street  
Dallas, Texas 75270



Gentlemen:

I am the chief financial officer of American Cyanamid Company, One Cyanamid Plaza, Wayne, New Jersey 07470. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (For further description of the facilities see Table II attached.)

<u>EPA Region</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>
I	\$ 603,500	\$1,860,000
II	12,062,400	765,000
III	1,721,600	936,000
IV	1,583,924	1,296,000
V	2,721,800	750,000
VI	592,200	204,300
VII	250,000	75,000
VIII	0	0
IX	36,750	0
X	11,000	0
<b>Grand Total</b>	<b>\$19,583,174</b>	<b>\$5,886,300</b>

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: (For further description of the facilities see Table II attached.)

<u>EPA Region</u>	<u>Closure Costs</u>	<u>Post Closure Costs</u>
I W. Springfield, Mass.	\$ 11,000	\$ 0
II Carolina and Manati, Puerto Rico and Clifton, N.J.	71,088	0
IV Memphis, Tenn.	2,350	0
V Evandale, Ohio	125,000	300,000
IX Sierra, California	48,000	300,000
	<b>\$257,438</b>	<b>\$600,000</b>



3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: Included in paragraphs 1 and 2 above.
4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: Included in paragraphs 1 and 2 above.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1981.

ALTERNATIVE II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) \_\_\_\_\_
2. Current bond rating of most recent issuance of this firm and name of rating service \_\_\_\_\_ \$ 26,326,912
3. Date of issuance of bond \_\_\_\_\_ As-3- Moody's
4. Date of maturity of bond \_\_\_\_\_ September, 1981
- \* 5. Tangible net worth \_\_\_\_\_ September, 1984
- \* 6. Total assets in U.S. (required only if less than 90% of firm's assets are located in U.S.) \_\_\_\_\_ \$1,513,457,000.

- |  | YES        | NO         |
|--|------------|------------|
| 7. Is line 5 at least \$10 million?  | <u>X</u>   | <u>   </u> |
| 8. Is line 5 at least 6 times line 1?  | <u>X</u>   | <u>   </u> |
| 9. Are at least 90% of firm's assets located in the U.S.? If not complete line 10. | <u>   </u> | <u>X</u>   |
| 10. Is line 6 at least 6 times line 1?   | <u>X</u>   | <u>   </u> |



-3-

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

AMERICAN CYANAMID COMPANY

*R. L. Martino*

R. L. Martino  
Vice President

Dated June 30, 1982

RLM/hm  
0002b/3422b

Attachment



TEXAS DEPARTMENT OF WATER RESOURCES  
1700 N. Congress Avenue  
Austin, Texas



Charles E. Nemir  
Executive Director

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman  
George W. McCleskey, Vice Chairman  
Glen E. Roney  
W. O. Bankston  
Lonnie A. "Bo" Pilgrim  
Louie Welch

TEXAS WATER COMMISSION

Paul Hopkins, Chairman  
Lee B. M. Diggart  
Ralph Roming

April 30, 1984

Mr. M. A. Taylor, President  
American Cyanamid Company  
600 North Jones Street  
Fort Worth, Texas 76106

Dear Sir:

Re: American Cyanamid Company, Application No. 10103, Registration  
No. 30023, 600 North Jones Street, Fort Worth, Texas site

We have reviewed Part A - Facility Background Information for the above  
referenced site and also the Affidavit of Exclusion which was recently  
submitted for the purpose of withdrawing the hazardous waste permit ap-  
plication from further consideration in accordance with the exclusion  
claimed.

Based on our review of Part A and the Affidavit of Exclusion, the  
application for a hazardous waste permit has been withdrawn. We are  
retaining certain portions of the Part A for incorporation into your  
solid waste registration file.

If I may be of further assistance, please do not hesitate to contact  
me.

Very truly yours,

*Charles Eanes*

Charles Eanes  
Permit Control & Reports

cc: HQ District 4  
EPA - TXD008017261

8/30/84/MS

Close Date  
4/30/84  
1105 = 6

OK FILE

5/31/84

6B





American Cyanamid Company  
600 North Jones Street  
Fort Worth, TX 76106  
(817) 332-2127

May 17, 1983

*cy of closure  
Plan to TOWE  
TOWE will notify us  
when complete.*

RECEIVED  
MAY 23 1983  
HAZARDOUS MATERIALS

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

U. S. Environmental Protection Agency  
Region VI  
1201 Elm Street  
Dallas, Texas 75270

Re: RCRA I.D. No. TXD00817261

Dear Sir:

American Cyanamid Company announced on May 13, 1983 its intent to discontinue production at its Fort Worth, Texas plant due to business reasons. This has precipitated the need to initiate the plant RCRA closure plan, a copy of which is attached, so that the plant can be closed by not later than June 30, 1983. We will forward documentation of closure of the hazardous waste management areas after the closure is completed.

Please contact me at telephone (817) 332-2127 if you have any questions on this submittal.

Very truly yours,

AMERICAN CYANAMID COMPANY

*F. J. Golets*  
F. J. Golets  
Plant Manager

FJG/pf

Attachment

Cc: Mr. Jay Snow, Director  
Texas Department of Water Resources  
1700 North Congress Avenue  
P. O. Box 13087, Capitol Station  
Austin, Texas 78711



INCLUDE DESIGN CAPACITY.

OR FOR DESCRIBING OTHER PROCESSES

PROCESSING FOR EACH PROCESS

Line No.

Process Code

Explanation

1

801

Waste is accumulated in 55 gallon drums.

2

801

Below-grade concrete neutralization tank.

#### IV. DESCRIPTION OF HAZARDOUS WASTES

**A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE

CODE

POUNDS

P

TONS

T

METRIC UNIT OF MEASURE

CODE

KILOGRAMS

K

METRIC TONS

M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### 1. PROCESSES

##### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

##### 2. PROCESS DESCRIPTION:

If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** - Hazardous waste that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column B(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				

included with above



RCRA  
FOR OFFICIAL USE ONLY  
APPLICATION DATE RECEIVED  
(yr, mo, & day)

(This is a Consolidated Permit Program  
application is required under Section 3005 of RCRA.)

FT KD 00 08 01 17 12 6 1 1

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (Place an "X" below and provide the appropriate data)  
☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)  
YR. MO. DAY  
4 8 0 5 3 0  
OPERATION BEGAN ON THE DATE CONSTRUCTION COMMENCED (for the boxes to the left)  
☐ 2. NEW FACILITY (Complete item below.)  
YR. MO. DAY  
17 12 6  
FOR NEW FACILITIES, PROVIDE THE DATE OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (Place an "X" below and complete item I above)  
☐ 1. FACILITY HAS INTERIM STATUS  
☐ 2. FACILITY HAS AN RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.  
1. AMOUNT - Enter the amount.  
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage: CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal: INJECTION WELL	D01	GALLONS OR LITERS
LANDFILL	D02	ACRE-FOOT (the volume that would cover one acre to a depth of one foot) OR RECTANGLE-METER
AND APPLICATION OCEAN DISPOSAL	D03	ACRES OR HECTARES
SURFACE IMPOUNDMENT	D04	GALLONS PER DAY OR LITERS PER DAY OR GALLONS OR LITERS

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment: TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
	T04	GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	V
CUBIC METERS	C
GALLONS PER DAY	D

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	C
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FOOT	A
HECTARE-METER	F
ACRES	P
HECTARES	G

EXAMPLE FOR COMPLETING ITEM III (shown in the numbers A-1 and B-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

B. PROCESS DESIGN CAPACITY			
LINE NUMBER	A. PRO- CESS CODE (from list above)	1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)
X-1	S02	600	G
X-2	T03	20	G
1	S01	45,870	G
2	S02	116,000	G
3	S04	3,000,000	G

B. PROCESS DESIGN CAPACITY			
LINE NUMBER	A. PRO- CESS CODE (from list above)	1. AMOUNT	2. UNIT OF MEAS- URE (enter code)
5			
6			
7			
8			
9			
10			



0152 0000 2299

EPA Form 3510-3 (Rev. 11-80) page 11

W T X D 0 0 0 8 0 1 7 2 6 1

FOR OFFICIAL USE ONLY

DUP

DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LNO.	A. EPA HAZARD. WASTE NO. (PRINT CODE)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (PRINT CODE)	D. PROCESSES	
				I. PROCESS CODES (enter)	J. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 1 2 0	125	T	S 0 1	
2	F 0 0 1	2.750	P	S 0 1	
3	F 0 0 2				
4	D 0 0 7	960.000	P	S 0 2	Included with above
5	<del>0 0 0 0</del>	<del>1. 10,000</del>	<del>T</del>	<del>S 0 1</del>	
6					
7					
8					
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25					
26					

EPA Form 3510-3 (Rev. 11-80)



PORT WORTH PLANT  
EPA I.D. NO. TXD00817261

CLOSURE PLAN



Introduction

Hazardous waste activities at the Fort Worth plant consist of three operations: (1) a drum storage area (designated S01) where drums of hazardous waste are accumulated and stored prior to off-site disposal, (2) a storage tank (designated S02) where a chromium containing process waste is accumulated and stored, and (3) a concrete tank in which plant wastewater is neutralized prior to discharge to the local POTW.

Drum Storage Area

All drums of hazardous waste will be shipped off-site to an approved secure landfill. Any contaminated soil in the 3750 square foot storage area will be excavated and drummed for off-site disposal at a secure landfill.

Storage Tank

The contents of the 113,000 gallon tank will be checked for chromium content by atomic adsorption spectrophotometric methods. If the contents contain 5 mg/l or more of chromium they will be shipped off-site for disposal and the tank will be decontaminated by triple rinsing with water. The final rinse will be checked for chromium content and, if necessary, the decontamination procedure will be repeated until no hazardous waste residues remain in the tank.

Neutralization Tank

The contents of the concrete neutralization tank will be checked for pH. If the pH is less than pH 2.0 or greater than pH 12.5, they will be neutralized and disposed of by discharge to the POTW. The tank will then be triple rinsed with water and the final rinse will be checked for pH to assure it is non-corrosive and thus confirm that no hazardous waste residues remain in the tank.

Closure Schedule

The useful lives of the heretofore mentioned tanks, pit drum storage area and associated conveyance systems are considered to terminate during the first quarter of the year 2010. The closure plan as outlined above would be implemented within 30 days of receipt of the final volume of wastes and would provide that all facilities could be safely closed within 180 days after such implementation.



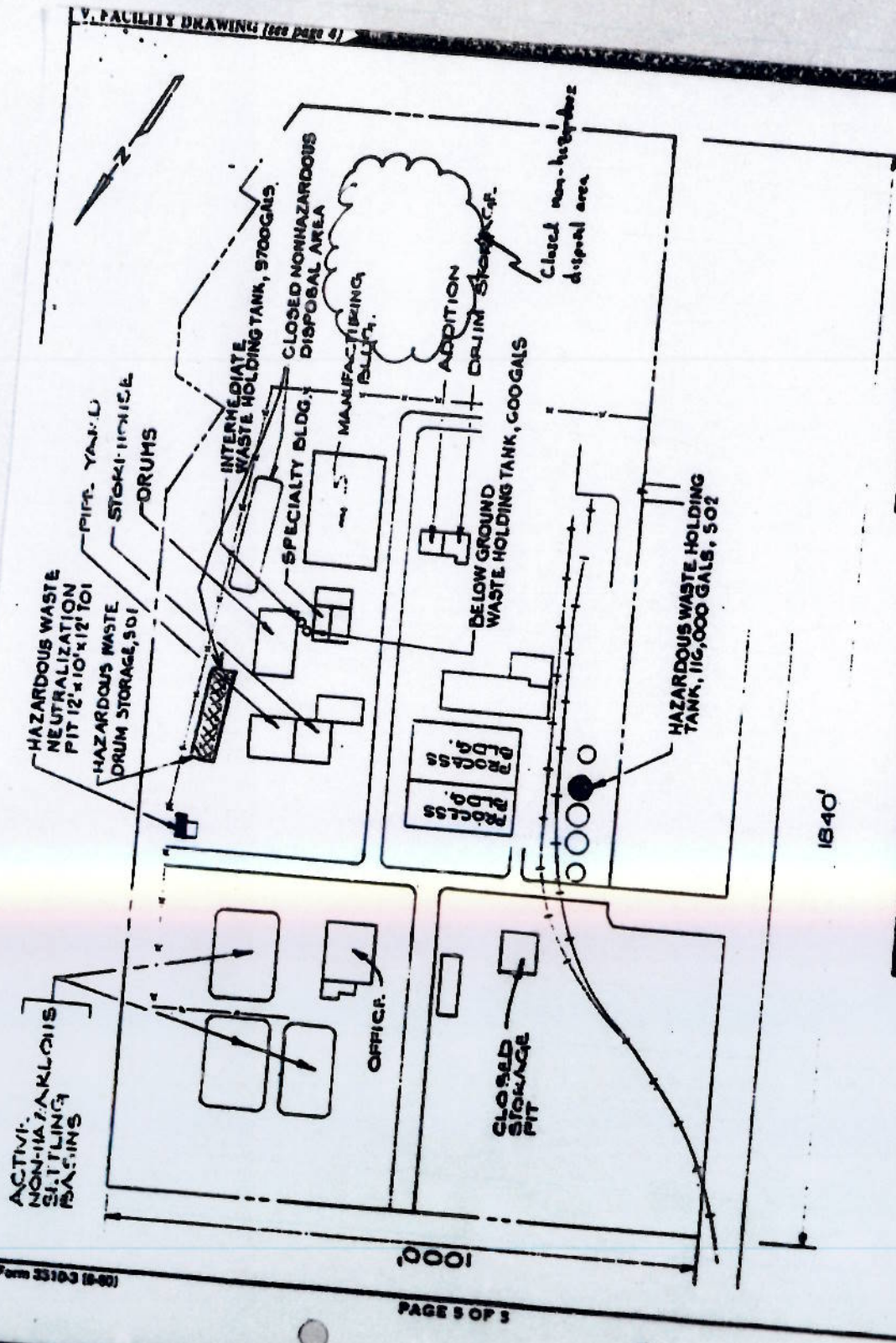
Post-Closure

No post-closure monitoring of hazardous waste facilities is planned for the Fort Worth Plant. All contaminated facilities are to be either decontaminated or removed for off-site disposal, therefore no residual hazardous wastes would be released following closure.

Closure Cost

The Closure cost estimated for the Fort Worth Plant is \$25,000. Attached is the Closure Plan for an explanation of the closure procedures.





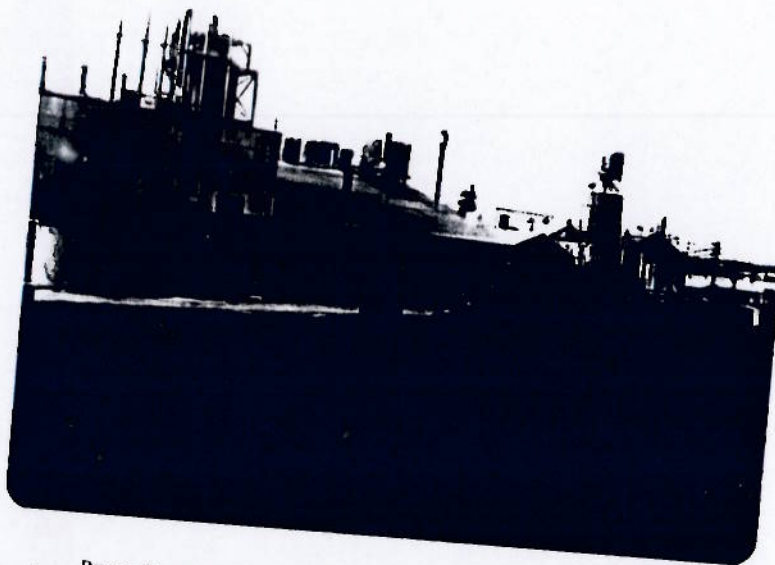
FORTH WORTH PLANT  
 AMERICAN CYANAMID CO.  
 WALDEMAR S. NELSON AND COMPANY  
 INCORPORATED  
 ENGINEERS AND ARCHITECTS  
 1200 ST. CHARLES AVE.  
 NEW ORLEANS, LA.  
 LOCATION PLAN  
 SCALE: 1"=200'  
 12



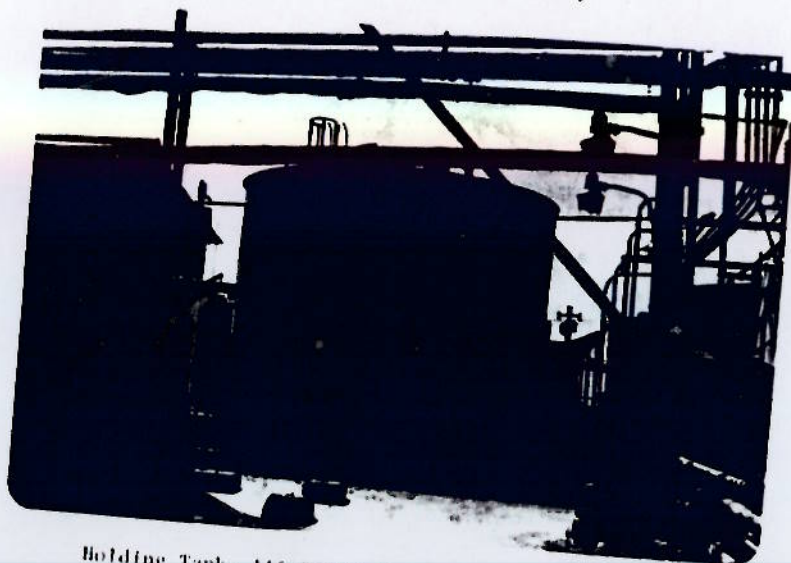
# POOR QUALITY DOCUMENT

FORM 3. HAZARDOUS WASTE PERMIT APPLICATION  
EPA I.D. NO. TXD008017261

## VI. PHOTOGRAPHS



Drum Storage Area, S01 (15 Oct. 1980)



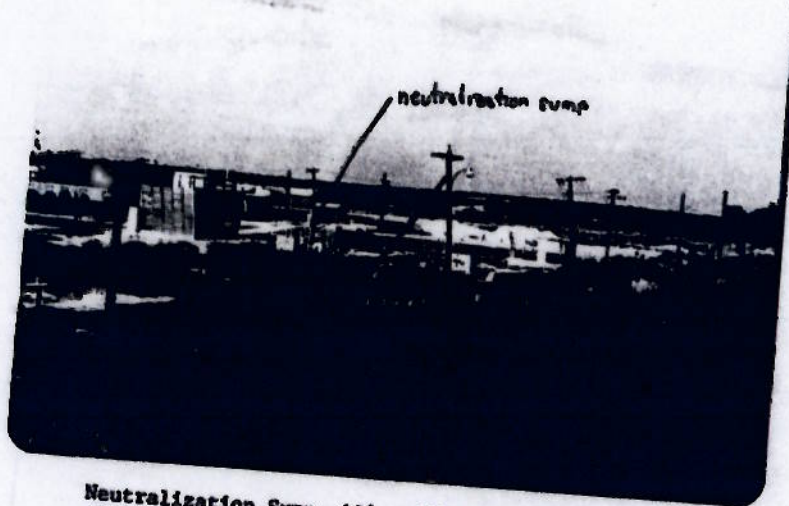
Holding Tank, 116,000 Gallons, S02 (15 Oct. 1980)



# POOR QUALITY DOCUMENT

PC 3. HAZARDOUS WASTE PERMIT APPLICATION  
I.D. NO. TXD00817261

VI. PHOTOGRAPHS (Cont.)



Neutralization Sump, 12' x 10' x 12', T01  
(15 Oct. 1980) (Sump is just to the right  
of the cooling tower)





American Cyanamid Company  
600 North Jones Street  
Fort Worth, TX 76106  
(817) 332-2127

August 4, 1981

CERTIFIED MAIL  
Return Receipt Requested

*Change*  
*3-11-82*

EPA Region VI  
Department 6 AEP  
1201 Elm Street  
First International Building  
Dallas, TX 75270

Re: American Cyanamid Company  
Fort Worth Plant  
EPA I.D. No. TKD008017261

Dear Mr. Woods:

In our Part A application for a hazardous waste permit submitted November 14, 1980, we included treatment facilities which have subsequently been exempted by the regulations. Specifically, process code T01 on line 3 of item III (on page 1 of form 3) and waste code D002 on line 5 of item IV (on page 3 of form 3) refer to the neutralization of wastes, which are characterized as hazardous only because of corrosivity, carried out in a concrete neutralization tank. We believe that this specific system is subject to the "elementary neutralization unit" exemption outlined in the November 17, 1980 Federal Register (45 FR 76074-76075) and request that our permit be modified by removing this tank from the classification of a hazardous waste treatment facility.

Revised affected pages of the application, based on the aforementioned changes, are attached. Please advise if there are any questions.

Yours very truly,

Hershel J. Mitchell  
Acting Plant Manager



HM/pf

Attachments





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

July 24, 1981

American Cyanamid Company  
Attn: Albert Hoff  
600 North Jones  
Fort Worth, Texas 76106

EPA ID NUMBER: TXD 00 801 7261

FACILITY LOCATION: 600 North Jones  
Fort Worth, Texas

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

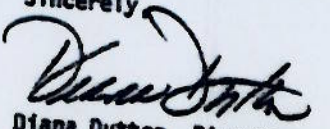
A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please contact Dwight Corley at (214) 767-2765, or write Mail Code 6E-P, 1201 Elm Street, Dallas, Texas 75270.

Sincerely,

  
Diana Dutton, Director  
Enforcement Division (6E)

cc: Texas Department of Water Resources



# CONDITIONS OF OPERATION DURING INTERIM STATUS

Date prepared: July 24, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location and EPA identification number:

Name: American Cyanamid Company

Location: 600 North Jones

Fort Worth, Texas

EPA ID No: TXD 00 801 7261

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265:

Owner's name: American Cyanamid Company

Operator's name: American Cyanamid Company

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated:

Process Code	Design Capacity Amount	Unit of Measure
T01	1,080,000.	Gallons per day
S02	116,000.	Gallons
S01	45,870.	Gallons

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid wastes exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers:

P120	F001	F002	D007	D002

EPA Region VI, Dallas, TX 75270  
(214) 767-2765



Part A. Permit Process --- Internal Checklist

ID Number TX000012461 Inst Name Amesbury Gymnasium Co.

PHASE ONE

Refer to Form No. 1  
 1/5/0 Facility? (If No, return to respondent.)  
 Form 1 received?  
 Form 3 received?  
 Postmarked on or before November 19, 1980?  
 Date of operation entered?  
 Date of operation on or before November 19, 1980?  
 Notifier?  
 Notified on or before August 18, 1980?  
 Form 1, XII B signed?  
 Form 3, IX B signed?  
 (If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgment and indicate the trigger date here:

PHASE TWO

Unsure if regulated or non-regulated?  
 New facility?  
 Core items missing? If Yes, indicate which items:  
 Facility name; location; mail address; operator info;  
 certification; process info; waste info; owner; sigs.  
 Non-core items missing? If Yes, indicate which items:  
 Maps; photos; drawings; lat/long.  
 Other observations and comments:

PHASE THREE

Received Date Stamp  
 80-11-18  
 (Stamp forms also)

Log out/Log in  
 on reverse side.



**OŪT**

[illegible]

**OUT**



CONTINUED FROM THE FRONT

A. FIRST 2,8,1,9 (specify)		Catalyst and catalyst substrate		B. SECOND (specify)	
C. THIRD (specify)				D. FOURTH (specify)	
A. NAME AMERICAN CYANAMID COMPANY					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.) P = PERSONAL S = STATE F = PRIVATE P (specify)					
E. STREET OR P.O. BOX BERDAN AVENUE				B. PHONE (area code & no.) 201 831 2000	
F. CITY OR TOWN WAYNE				H. ZIP CODE NJ 07470	
I. CROSSING UNDERGROUND PERMITS A. WPD (Discharge to Surface Water) B. WPD (Air Emissions from Proposed Sources) C. WPD (Underground Injection of Fluids) D. WPD (Other) (specify) X - 725 (specify) E. OTHER (specify) C - 56 (specify)					
See attached sheet for additional State permits Texas Clean Air Act Texas Air Control Board					

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its foundations, waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

A. NAME & OFFICIAL TITLE (Print)  
 W. G. Paxton, President  
 Chemical Products Division

B. SIGNATURE

C. DATE SIGNED

F9: A  
51



**CONTINUE ON REVERSE**



Continued from the front.

### III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Line No.	Process Code	Explanation
1	S01	Waste is accumulated in 55 gallon drums.
3	T01	Below grade concrete neutralization tank.

### IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

##### 1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.  
For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	900	900	P	T-0-0-0	
X-2	200	200	P	T-0-0-0	
X-3	200	200	P	T-0-0-0	
X-4	100	100	P	T-0-0-0	



**CONTINUE ON REVERSE**



Continued from the front.

**IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**

**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1.**

Line No.

EPA Waste No.

1

P120

Includes off grade vanadium containing catalyst stored pending recovery as well as a minor amount of empty raw material bags.

EPA I.D. NO. (enter from page 1)

FTXD00801726136

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)

32 45 27.9

LONGITUDE (degrees, minutes, & seconds)

097 20 08.8

**VIII. FACILITY OWNER**

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.
- B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

W. G. Paxton, President  
Chemical Products Division

B. SIGNATURE

*W. G. Paxton*

C. DATE SIGNED

11/10/80

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

EPA Form 3510-3 (8-80)



Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 25 wastes to list.

Form Approved OMB No. 155-580004

106

EPA I.D. NUMBER (enter from page 1)

WTXD0008017261

FOR OFFICIAL USE ONLY

DUP

DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	P 1 2 0	125.000	T	S 0 1	
2	F 0 0 1	2,750.000	P	S 0 1	
3	F 0 0 2				
4	D 0 0 7	960,000.000	P	S 0 2	Included with above
5	D 0 0 2	820 000.000	F	T 0 1	removed 3-11-82
6	D 0 0 2	820 000.000	T	T 0 1	
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EPA Form 3510-3 (8-80)

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

CONTINUE ON REVERSE





600 North Jones  
Fort Worth, TX 76106

TRD-00 801-7261

189

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

November 14, 1980


EPA Region VI  
Attn: 6 ARP  
1201 Elm Street  
First International Bldg.  
Dallas, TX 75270

Dear Mr. Woods:

Attached herewith is Part A, Application for a Hazardous Waste Permit for the Fort Worth plant submitted in accordance with the regulations contained in EPA's Consolidated Permits Program.

This submission or any past or future discussions or communication with respect to this matter is not intended to admit any liability or to waive any rights.

Very truly yours,

  
Albert Hoff  
Plant Manager





EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

FORM I. EPA GENERAL INFORMATION

EPA I.D. NO. TXD008017261

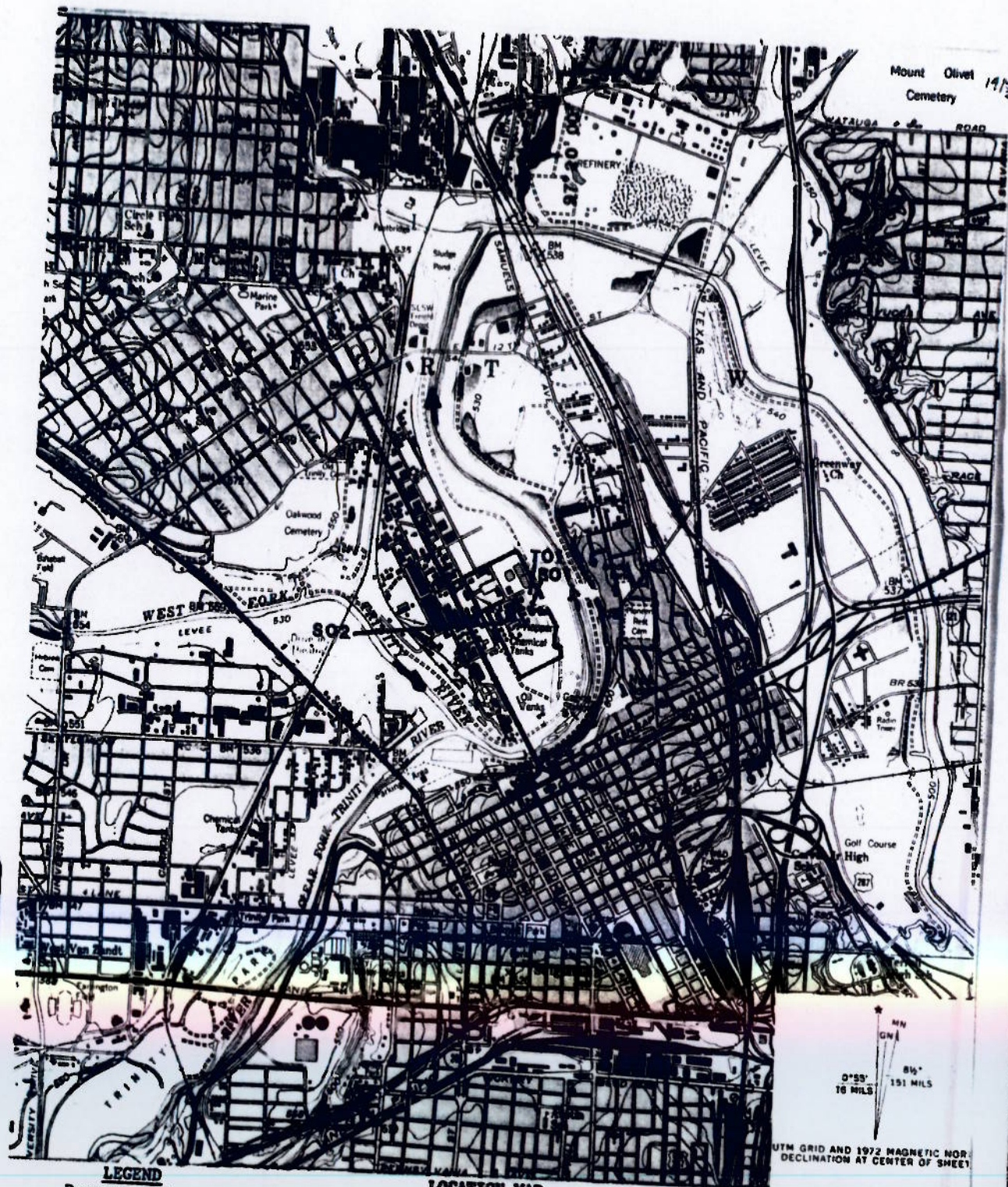
II. Pollutant Characteristics

\*The Fort Worth Plant submitted an NPDES permit application for approval on September 23, 1980.

X. Existing Environmental Permits (continued)

3660	Texas Air Control Board
R-1457	Texas Air Control Board
R-393	Texas Air Control Board
POTW-69	Fort Worth Water Department
30023-TX	Texas Department of Water Resources





**LEGEND**  
Property Line —

**LOCATION MAP**  
**AMERICAN CYANAMID COMPANY**  
**FORT WORTH PLANT**

**SCALE 1:24,000**  
1000 0 1000 Ft.

**USGS MAPS: Haltom City, TX**  
**Fort Worth, TX**

UTM GRID AND 1972 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET



DATE 3-11-82

3-11-82

3-17-82

ENVIRONMENTAL PROTECTION AGENCY  
HAZARDOUS WASTE DATA MANAGEMENT SYSTEM  
FACILITY MAINTENANCE FORM

Form with multiple sections for facility maintenance data, including fields for location, date, and status.



Entered 6/7/16



The diagram illustrates a computer system architecture with the following components and connections:

- Central Bus:** A vertical line connecting all major components.
- Memory Modules:** Multiple long horizontal bars, each labeled "MEMORY" and "16K".
- Processing Unit:** A central block labeled "CPU" and "SYSTEM UNIT".
- Storage:** A block labeled "DISK DRIVE".
- Output/Interface:** A block labeled "PRINTER".
- Input/Output:** A block labeled "TERMINAL".

The diagram shows the flow of data and control signals between these components, with various lines and labels indicating the type of connection (e.g., "DATA", "ADDRESS", "CONTROL").



Print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S78016  
GSA No. 0246-EPA-07



U.S. ENVIRONMENTAL PROTECTION AGENCY

INSTALLATION'S EPA I.D. NO.

TXD008017261

I. NAME OF INSTALLATION

AMERICAN CYANAMID COMPANY

II. INSTALLATION MAILING ADDRESS

600 N JONES

FORT WORTH

TX 76106

III. LOCATION OF INSTALLATION

600 N JONES

FORT WORTH

TX 76106

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

DETACH A

COMMENTS											

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
TXD008017261		800818

000004

I. NAME OF INSTALLATION
AMERICAN CYANAMID COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX
3600 NORTH JONES

CITY OR TOWN	ST.	ZIP CODE
FORT WORTH	TX	76106

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER
5600 North Jones

CITY OR TOWN	ST.	ZIP CODE
Fort Worth	TX	76106

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 MOFFAW Plant Manager	817-332-2127

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER
8 AMERICAN CYANAMID CO.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)
F - FEDERAL M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
<input checked="" type="checkbox"/> A. GENERATION <input checked="" type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> B. TRANSPORTATION (complete item VII) <input type="checkbox"/> D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION	B. SUBSEQUENT NOTIFICATION (complete item C)
<input checked="" type="checkbox"/>	<input type="checkbox"/>

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (5-80)

CONTINUE ON REVERSE



A. HAZARDOUS WASTES FROM NON-PROCESSING ACTIVITIES. Enter the four-digit number from 40 CFR Part 261.21 (1-4) with Hazardous Waste from non-specific source your treatment facility. Use additional sheets if necessary.

**8. PREVIOUS EMPLOYERS FROM SPECIFIC INDUSTRIES.** Enter the four-digit number from 00-9999 Part B(7)(ii) for each listed employer.  
Specify industry under your selection.

8. HAZARDOUS WASTE FROM SPECIFIC SOURCES. Enter the four-digit number from 28 CFR Part 201.22 for each listed hazardous waste from specific sources at your installation location. Use additional sheets if necessary.

Use additional sheets if necessary.

12	14	16	18	20	22
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17	19	21	23	25	27
18	20	22	24	26	28
19	21	23	25	27	29
20	22	24	26	28	30

COMMERCIAL CHEMICAL PRODUCT HANDBOOK MARKET

**C. COMMERCIAL CHEMICAL PRODUCT MANUFACTURING WASTES.** Enter the following number from 00 (0-9) Part 001.03 for each chemical waste  
 (Enter your business' location code from 00 (0-9) Part 001.03 for each chemical waste.)

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 P 1 2 0  
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D. LISTED INSPECTIONS REQUIRED. Under this item, list number from 40 Code Book 200-25 for each listed inspection taken from hospital, nursing home, resident and research institutions from inspection records. Use additional sheets if necessary.

E. CHARACTERISTICS OF NON-UNITED STATES CITIZENS AND ALIENS

	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	
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E. CHARACTERISTICS OF THIS LISTED HAZARDOUS MATERIAL. Mark "X" in the box(s) corresponding to the characteristic of this hazardous material.

1. Corrosive	<input type="checkbox"/>
--------------	--------------------------

☐ 1. NON-TOXIC ☐ 2. CORROSIVE ☐ 3. INFLAMMATORY ☐ 4. IRRITANT ☐ 5. OXIDIZING ☐ 6. EXPLOSIVE ☐ 7. EXTREMELY FLAMMABLE ☐ 8. EXTREMELY TOXIC ☐ 9. EXTREMELY CORROSIVE ☐ 10. EXTREMELY INFLAMMATORY ☐ 11. EXTREMELY IRRITANT ☐ 12. EXTREMELY OXIDIZING ☐ 13. EXTREMELY EXPLOSIVE

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for knowingly writing false information, including the possibility of fine and imprisonment.

SIGNATURE \_\_\_\_\_

**SIGNATURE**

AW Hoff  
m 8700-12 (8-80) REVERSE 06

NAME & OFFICIAL TITLE (type or print)

Plant Manager

DATE SIGNED \_\_\_\_\_

7/22/80





American Cyanamid Company  
Industrial Chemicals Division  
Wayne, NJ 07470

August 12, 1980

TXD 008017261

EPA Region VI  
ATTN: GAMP  
1201 Elm Street  
First International Building  
Dallas, TX 75270

Reference: American Cyanamid Company  
Fort Worth, TX Plant  
TXD 008017261

Dear Sir:

Please find attached the Notification of Hazardous Waste Activity, EPA  
Form 8700-12, for American Cyanamid Company's Fort Worth, TX plant.

Please advise if any further information is required.

Very truly yours,

*R.B. Tabakin*

R. B. Tabakin  
Coordinator, Environmental  
Science

RBT/mch  
ATTACHMENT

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED





PLEASE PRINT OR TYPE WITH ELITE TYPE (DATA TERMINAL) IN THE UNSHADOWED AREAS ONLY.

Form Approved GSA No. 246-EPA-07



# ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.  
I. NAME OF INSTALLATION  
II. INSTALLATION MAILING ADDRESS  
III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

## FOR OFFICIAL USE ONLY

DETACH A

COMMENTS

INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr, mo, & day)

I. NAME OF INSTALLATION  
YANAMID DISTRIBUTION CENTER

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX  
31245 VICEROY DRIVE

CITY OR TOWN ST. ZIP CODE  
DALLAS TX 75247

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER  
51245 VICEROY DRIVE

CITY OR TOWN ST. ZIP CODE  
DALLAS TX 75247

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.)  
HUNTER MG DIST. CENTER MANAGER 214-688-1781

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

B. TYPE OF OWNERSHIP (enter the appropriate letter in box)  
F - FEDERAL  
M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))  
A. GENERATION  
B. TRANSPORTATION (complete item VII)  
C. TREAT/STORE/DISPOSE  
D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))  
A. AIR  
B. RAIL  
C. HIGHWAY  
D. WATER  
E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION  
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION  
B. SUBSEQUENT NOTIFICATION (complete item C)

IX. DESCRIPTION OF HAZARDOUS WASTES  
Please go to the reverse of this form and provide the requested information.



I.D. - FOR OFFICIAL USE ONLY									
W	T	X	D	0	0	0	8	3	8
7	0	7	0	7	0	7	0	7	0
2	1	1	1	1	1	1	1	1	1

**IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input checked="" type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input type="checkbox"/> 4. TOXIC (D006)
---	--	---	--

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>M. G. Hunter</i>	NAME & OFFICIAL TITLE (type or print) M. G. Hunter, Dist. Center Manager	DATE SIGNED 8-15-80
----------------------------------	---	------------------------



Please print or type with SLITS type

CHARACTERISTICS IN THE UNSHADOWED SPACES ONLY.

Form 4, revised July 1975 EPA 16  
GSA No. 0246-EPA-07



# ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED

I. NAME OF INSTALLATION

000121

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

00-083-8904

CITY OR TOWN

ST. ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

CITY OR TOWN

ST. ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL  
M - NON-FEDERAL

1. GENERATION

2. TRANSPORTATION (complete item VII)

3. TREAT/STORE/DISPOSE

4. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

A. AIR

B. RAIL

C. HIGHWAY

D. WATER

E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

1. FIRST NOTIFICATION

2. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (8-80)

CONTINUE ON REVERSE





American Cyanamid Company  
Wayne, NJ 07470

August 15, 1980

This location is a warehouse and distribution center which handles a wide variety of commercial products. Some of these products could qualify as hazardous wastes under RCRA when it becomes necessary to dispose of them.

As is true of any such activity, a small quantity of waste material, including waste which could be classified as hazardous wastes under RCRA, is occasionally generated at this location via damaged containers.

To the best of our knowledge, no such generation of hazardous wastes under RCRA has occurred at this site during the preceding ninety (90) days. However, the future frequency and extent of such generation events cannot be reasonably predicted.

It is our understanding that, although such future generation events may occur only very infrequently, and although the quantities of hazardous waste so generated might be well within any small quantity generator exclusion limits established by the EPA, we may be required by 261.5(d) to have interim status as a treatment/storage/disposal facility under RCRA in order to conduct the normal activities incidental to the clean up and disposal of any hazardous wastes so generated.

Accordingly, we are submitting the enclosed Notification of Hazardous Waste Activity and requesting Part A of the application in order to obtain interim status under RCRA as a treatment/storage/disposal facility.

The certification in the enclosed Notification is made in light of the above approach to this matter.

Very truly yours,

AMERICAN CYANAMID COMPANY

Enclosure





Amesbury  
C. J. B. 11/18/81

# DATA CHANGES

EPA IDENTIFICATION NUMBER/C101=12										TMC #/C116=6										PREPARER										DATE									
Facility Name/C104=40																				JH										4-8-88									
Mailing Address/C106=30																														County/C114=3									
City/C107=25																														Zip/C109=5									
Facility Contact Person/C105=30																														ST/C108=2									
Location Address/C110=30																														Ownership Code/C102									
City/C111=25																														ST Dist/C115=2									
Owner's Name/C1503=40																														Zip/C113=5									
GEN TRN TSD UIC										C1105										C305										Other									
Waste Codes to be added/C2701										C119 = 1										C										Telephone/C113=10									
Process Codes- Add - Delete - Change										Waste Codes to be deleted/C2701																													
C1801=3										C1802=13										C1803=1										C1804=1									
C1801=3										C1802=13										C1803=1										C1804=1									
C1801=3										C1802=13										C1803=1										C1804=1									
Other Coding as necessary																																							

Entered by: \_\_\_\_\_ Date Entered: \_\_\_\_\_  
QC: 4/18/88 File Code: JF-8.1



AFFIDAVIT OF EXCLUSION FROM HAZARDOUS WASTE PERMITTING REQUIREMENT

Registration No. 30029  
Application No. 10103 TXD 008017261  
Facility Name (Dept. Use Only)  
County of \_\_\_\_\_

M. A. Taylor

being duly sworn, deposes and says:

I am President, Chemical Products Division, having responsibility for American Cyanamid Company's Ft. Worth, TX Plant; 600 North Jones Street; Ft. Worth, TX 76106.  
Title (Owner or Principal Officer) Facility Owner  
and Address

This affidavit is being executed for the purpose of notifying the Executive Director of the Texas Department of Water Resources that the named facility does not require a hazardous waste permit because:

Check appropriate box(es):

- ☐ No hazardous waste is stored, processed or disposed on-site
- ☐ The facility qualifies for the "Accumulation Time" storage exclusion of Texas Administrative Code, Section 335.69
- ☐ The facility qualifies for the "Small Quantity Generator" exclusion of Texas Administrative Code, Section 335.2(e)
- ☐ The facility qualifies for the "Elementary Neutralization Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☐ The facility qualifies for the "Wastewater Treatment Unit" exclusion of Texas Administrative Code, Section 335.2(f)
- ☒ Other (Explain with an attachment and reference TDMR rule) This facility has been closed in accordance with an approved closure plan. The facility no longer stores, processes, or disposes of hazardous waste.

Sworn to before me this 16<sup>th</sup> day of December, 1986.

12/18/84

M. A. Taylor  
Signature M. A. Taylor

Katrina Churchill  
Notary Public in and for

Passaic County, N.J.

My commission expires October 19, 1985

Del Gen  
Del TSD  
Chg C119 EQ 3  
Remove Part A  
Remove Process codes



OK File

### 4. INDEX

1-30-84 GIB

UNITED STATES DEPARTMENT OF AGRICULTURE

Res a Reson

CR Type

### 2. ENFORCEMENT ACTIONS FOR VIOLATIONS:

Seydlitz



TEXAS DEPARTMENT OF WATER RESOURCES



NEW

X  
C.S.  
WMM

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT

INDUSTRY NAME: American Cyanamid Company PHONE: (214) 4469783

SITE ADDRESS: 600 N. Jones St., Fort Worth, Tx ZIP: \_\_\_\_\_ COUNTY: Tarrant

TOWR PERMIT OR REGIS. NO. 30023 EPA ID NO. TX0008017261

INDUSTRY NAME: AMERICAN DISTRICT 09 DATE REPORT SUBMITTED 04/04

TYPE OF FACILITY 12 MAJOR/NONMAJOR N TYPE OF EVALUATION EY

DATE OF EVALUATION OR ENFORCEMENT REFERRAL 03-22-84

Types Of Violations	Deg.	Date Of Notif. Letter	Date Of Inf. Enf. Act.	Date Response Due	Date Of Actual Compliance	Resolved/ Unresolved
GWM						
INC						
CLO						
FIN						
PTB						
MAN						
SCH						
OTH						

COMMENTS:

01 004 3 4 11 13 15 18 21 23 25 29 31 33 35 39 41 43  
45 49 51 53 55 59 61 63 65 67 71 73 75 79 81 83 85 89 91 93

\*02 Closure pending; certification being reviewed.

NUMBER OF SAMPLES: \_\_\_\_\_

TOWR 0814 (Rev. 10-28-83)  
Page 1 of 2

WORK NO.: 9091

SUBMITTED BY: Christopher J. [Signature]

u: 0-4



SUBMITTED BY:

NUMBER OF SAMPLES:

[illegible]

DATE OF EVALUATION OR ENFORCEMENT REFERRAL

TYPE OF FACILITY

**MAJOR/NO MAJOR**

### TYPE OF EVALUATION

INDUSTRY NAME

DISTRICT

12	02
1	9

DATE REPORT SUBMITTED)

**W O F A**

TOWER PERMIT OR REGIS. NO.

**EPA ID NO.**

1	9	2	2	1	0	8	0	0	0	X	1
---	---	---	---	---	---	---	---	---	---	---	---

INDUSTRY NAME:

SITE ADDRESS: \_\_\_\_\_

212

COUNTRY:

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT AND OPERATIONS

6/12/84

02. I I 1111

DEAR334



TEXAS DEPARTMENT OF WATER RESOURCES







**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,  
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (See front)**

1. If you want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, leaving the receipt attached, and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub on the left portion of the address side of the article, also, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified-mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, after to back of article, endorse front of article RETURN RECEIPT REQUESTED adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse RESTRICTED DELIVERY on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in Item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

\*GPO: 1980 331-000





SEP 12 1983

FACILITY IDENTIFICATION NUMBER

FACILITY NAME

09 80

FACILITY IDENTIFICATION NUMBER

1 2 3 4 5 6 7 8 9 10 11 12

13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

31 32 33 34 35 36 37 38 39 40

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61 62 63 64 65 66 67 68 69 70

71 72 73 74 75 76 77 78 79 80

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101 102 103 104 105 106 107 108 109 110

111 112 113 114 115 116 117 118 119 120

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131 132 133 134 135 136 137 138 139 140

141 142 143 144 145 146 147 148 149 150

151 152 153 154 155 156 157 158 159 160

161 162 163 164 165 166 167 168 169 170

171 172 173 174 175 176 177 178 179 180

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A vertical ruler with three scales. The top scale is labeled 'FACILITY IDENTIFICATION NUMBER' and ranges from 1 to 12. The middle scale is labeled 'FACILITY ADDRESS' and ranges from 10 to 13. The bottom scale is labeled 'COUNTY NUMBER' and ranges from 60 to 70. The text '61600 W. BROAD ST.' is written vertically along the ruler, corresponding to the facility address scale.